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**BEFORE THE**

**POSTAL RATE COMMISSION  
WASHINGTON, DC 20268-0001**

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

**POSTAL RATE AND FEE CHANGES, 1997**

**Docket No. R97-1**

**DOUGLAS F. CARLSON  
INTERROGATORIES TO UNITED STATES POSTAL SERVICE  
WITNESS JOE ALEXANDROVICH  
(DFC/USPS-T5-4-10)**

**September 15, 1997**


Pursuant to sections 25 and 26 of the *Rules of Practice*, I, Douglas F. Carlson, hereby submit interrogatories to United States Postal Service witness Joe Alexandrovich.

If the witness is unable to provide a complete, responsive answer to a question, I request that the witness redirect the question to a witness who can provide a complete, responsive answer. In the alternative, I request that the question be redirected to the Postal Service for an institutional response.

The instructions contained in my interrogatories to witness Frank (DFC/USPS-T32-1-7) are incorporated herein by reference.

Respectfully submitted,

Dated: September 15, 1997



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**DOUGLAS F. CARLSON**

**DFC/USPS-T5-4.** Please confirm that the attributable cost for postal cards in Attachment 1 to Response to DFC/USPS-T5-2(b) includes the manufacturing costs. If you do not confirm, please explain.

**DFC/USPS-T5-5.**

a. Please describe the training process (including number of hours of training) for IOCS data collectors.

b. Please confirm that the Postal Service currently offers for sale seven different designs of 20-cent stamped cards. If you do not confirm, please explain.

c. Please explain why IOCS data collectors are not or cannot be trained sufficiently well to allow them to recognize a stamped card.

d. Please provide all documents discussing or otherwise relating to the difficulty that IOCS data collectors have experienced differentiating between stamped cards and private post cards.

e. Please explain and provide all documents relating to the Postal Service's attempts to improve the ability of IOCS data collectors to differentiate between stamped cards and private post cards.

f. Please identify all points in the mail-processing system in which IOCS data collectors would have been required, under the old procedures, to differentiate between stamped cards and private post cards.

g. Please explain why a stamped card, with its colorful postage indicia, would be difficult to differentiate from a private post card for which postage had been paid by meter imprint or permit imprint.

h. Please provide an example of a 20-cent postage stamp that is as large as the postage indicia on a 20-cent stamped card that is currently offered for sale.

**DFC/USPS-T5-6.** Please refer to item 2 on page 4 of Attachment I to Response to DFC/USPS-T5-2(c) and your response to DFC/USPS-T5-2(c). In your response, you listed two "primary" reasons why the Postal Service stopped collecting separate cost

data for stamped cards and private post cards. However, item 2 of the attachment lists another rationale: "We no longer have a need to identify postal cards separately."

a. Did the Postal Service ever have a need to collect the data separately? Please explain fully and provide all documents relating to this need.

b. Please explain and provide documents relating to the reasons why the Postal Service had ceased by January 12, 1996, to need to collect these data separately.

c. Is this presently nonexistent need to collect the data separately also a "primary" reason for this change in the data-collection procedures?

**DFC/USPS-T5-7.** Please refer to page 6 of Attachment 1 to Response to DFC/USPS-T5-2(c).

a. Please confirm that item 6 indicates or implies that IOCS data collectors must examine Express Mail items to determine whether an Express Mail corporate account was used to pay the postage. If you do not confirm, please explain.

b. Please explain why the Postal Service can train an IOCS data collector to examine or otherwise review an Express Mail label to determine whether an Express Mail corporate account was used to pay the postage but cannot train an IOCS data collector to distinguish between stamped cards and private post cards. Please provide all available documents.

**DFC/USPS-T5-8.** Please refer to Attachment II to Response to DFC/USPS-T5-2(c).

a. Please refer to item 4 and confirm that IOCS data collectors previously were required to analyze whether a piece of mail was automation compatible, whether a piece of mail was bar-coded, the print type, and the bar-code location.

b. Please explain why the Postal Service could more easily or successfully train an IOCS data collector to conduct the analysis or make the distinctions that would be necessary to collect the data listed in item 4 than to train an IOCS data collector to differentiate between stamped cards and private post cards.

**DFC/USPS-T5-9.** Please refer to your response to DFC/USPS-T5-3(d).

a. Please explain and provide all documents relating to Postal Service policy or procedures in determining whether to stop collecting data separately for two types of mail or services.

b. Please explain and provide all documents relating to the role that the significant cost differential between stamped cards and private post cards played in the decision to eliminate the distinction between stamped cards and private post cards.

c. If your answer to part (b) indicates that the cost differential played a small, insignificant, or nonexistent role, please explain why the masking of this cost differential that the change in data-collection methods will cause is in the public interest.

**DFC/USPS-T5-10.** Suppose that 1,000 customers who currently receive carrier delivery switch to post-office-box delivery. They notify the senders of their new address, and all their mail thereafter is addressed to their post-office box. If all else is equal, please confirm that the mail-processing cost of delivering this mail to the post-office boxes will be lower than the mail-processing cost that would have been incurred if this mail had been delivered to these customers' street address.

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#### **CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing document upon the required participants of record in accordance with section 12 of the *Rules of Practice* and sections 3(B) and 3(C) of the *Special Rules of Practice*.



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DOUGLAS F. CARLSON

September 15, 1997  
Emeryville, California